



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BROOKFIELD PLACE, 200 VESEY STREET, SUITE 400
NEW YORK, NY 10281-1022

June 29, 2021

Via ECF

The Honorable Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Contrarian Press, LLC, et al., 16 Civ. 06964 (VSB) (DCF) (S.D.N.Y.)

Dear Judge Broderick:

Plaintiff Securities and Exchange Commission (“SEC”), jointly with Defendants Contrarian Press, LLC and Scott S. Fraser, respectfully submit this letter to seek approval of the Commission’s enclosed proposed final consent judgment with Defendant Scott S. Fraser (“Fraser”) in this case.

The Commission filed this action against Fraser, his company, Contrarian Press, LLC (“Contrarian Press”), and Nathan Yeung (“Yeung”) on September 6, 2016, alleging violations of the anti-touting and antifraud provisions of the federal securities laws—Section 17(b) of the Securities Act of 1933 (“Securities Act”) and Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder. The Court entered a final judgment on consent as to Yeung on August 28, 2019. (DE 99.) The remaining parties informed the Court that they had, pending approval by the Commission, reached an agreement to resolve the Commission’s claims in this matter. (DE 154.) The Court ordered the parties to submit a joint status report on the earlier of (i) whenever the settlement agreement was finalized or (ii) July 2, 2021.

The Court should approve the final consent judgment as to Fraser because it is fair and reasonable and in the public interest under *SEC v. Citigroup Global Markets, Inc.*, 752 F.3d 285 (2d Cir. 2014). The remedies in the consent decree are legal, the enforcement mechanisms are clear, and the consent reflects a resolution of the actual claims in the Commission’s Complaint. *See Citigroup*, 752 F.3d at 294-95. This final consent judgment would resolve the Commission’s case against Fraser, without his admitting or denying any of the Commission’s allegations, by imposing injunctions against future violations of the anti-touting and antifraud provisions of federal securities laws, prohibiting Fraser from acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act or that is required to file reports pursuant to Section 15(d) of the Exchange Act or engaging in the offering of any penny stock, and order a civil monetary penalty of \$125,000.

In addition, contemporaneously with this letter and the settlement documents, the Commission is filing a Notice of Dismissal against Defendant Contrarian Press because it has

ceased operating. Accordingly, entry of the proposed final judgment would fully resolve the Commission's action.

The Commission therefore respectfully requests that the Court approve the enclosed final judgment and have it docketed with the enclosed consent attached.

Respectfully submitted,

/s/ Victor Suthammanont
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